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March 8, 2012

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109, Universal Service Reform-Mobility Fund, WT Docket No. 10-208*

Dear Ms. Dortch:

Mary McManus and Brian Rankin of Comcast Corporation ("Comcast") and the undersigned, outside counsel to Comcast, met on March 6, 2012 with Michael Steffen of Chairman Genachowski's Office; Sharon Gillett, Rebekah Goodheart (via telephone), Randy Clarke, and Travis Litman of the Wireline Competition Bureau; and separately with Angela Kronenberg of Commissioner Clyburn's Office. The purpose of the meeting was to discuss arguments advanced by Windstream Communications, Inc. ("Windstream") and Frontier Communications[1] ("Frontier") regarding the charges applicable to originating intrastate TDM toll traffic that is terminated over a VoIP

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1 Petition for Reconsideration and/or Clarification of Frontier Communications Corp. and Windstream Communications, Inc., WC Docket No. 10-90, at 21-29 (Dec. 29, 2011).

network under the Commission's transition plan.[2] Comcast's representatives explained that contrary to the claims of the incumbent local exchange carriers ("LECs"), the Order plainly mandates that the default rates applicable to such originating intrastate toll traffic are the originating carrier's interstate access rates. Moreover, the change proposed by Windstream and Frontier would provide more favorable rate treatment for TDM network operators and thereby deter them from upgrading their facilities to IP technology.

Comcast's representatives further urged the Commission not to reconsider the VoIP-PSTN provisions of its Order, because it imposes a symmetrical compensation scheme on TDM-based and VoIP-based service providers that exchange traffic. Both types of providers generally will receive lower revenues from such originating intrastate toll traffic than they did under the pre-Order compensation regime. Comcast estimates that the impact on Comcast will amount to several million dollars annually. Accordingly, if the Commission nonetheless decided to grant the incumbent LECs' request for reconsideration, Comcast's representatives urged the Commission to ensure that intrastate VoIP-originated toll traffic that is terminated in TDM is treated symmetrically with TDM-originated traffic that is terminated in VoIP and assessed intrastate access charges, pending further reforms.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed for inclusion in the public record of the above referenced proceedings.

Respectfully submitted,

/s/ A. Richard Metzger, Jr.
A. Richard Metzger, Jr.

cc: Michael Steffen, Sharon Gillett, Rebekah Goodheart, Randy Clarke, Travis Litman, Angela Kronenberg, Christine Kurth

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[2] *See Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 03-109, 05-337, 07-135, and 10-90; GN Docket No. 09-51; CC Docket Nos. 96-45 and 01-92; and WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) ("Order").